

VALLEY COUNTY, MONTANA

**Instructions for using the attached Crosswalk Reference Document
for Review and Submission of Local Mitigation Plans
to the State Hazard Mitigation Officer and FEMA Regional Office**

Attached is a crosswalk reference document, which is based on the Final Draft Report ***State and Local Plan Interim Criteria Under the Disaster Mitigation Act of 2000***, published by FEMA HQ and dated July 11, 2002. This document was based on the *Disaster Mitigation Act of 2000* (P.L. 106-390), enacted October 30, 2000 and *44 CFR Parts 201 and 206 Interim Final Rule*, published February 26, 2002.

The purpose of the crosswalk is to provide a tool to local jurisdictions in developing and submitting Mitigation Plans under Section 322 of the Disaster Mitigation Act of 2000. The crosswalk can be used to assist local or multi-jurisdiction entities in the process of developing and reviewing Local or Multi-jurisdictional plan(s). Each Local or Multi-jurisdictional plan should be reviewed by the pertinent local jurisdictional entity prior to submitting the plan to the respective State. In addition as stated in the Interim Final Rule §201.6(d)(1) "Plans must be submitted to the State Hazard Mitigation Officer for initial review and coordination. The State will then send the plan to the appropriate FEMA Regional Office for formal review and approval." The local jurisdiction must fill out column 3 prior to submitting the plan for formal review and approval.

Tribes may submit hazard mitigation plans through their respective states or they can directly submit their plans to FEMA Region VIII. This means they can write a Local or Multi-jurisdictional Plan as a sub-grantee or they may write a Standard or Enhanced State Plan as a Grantee. When tribes are considering how they want to develop and submit their plans, they need to consider whether or not they want to be Grantees directly from FEMA or Sub-grantees through their respective states. The deciding factor would be how they want to apply for and receive Pre-disaster Mitigation Grant projects, Hazard Mitigation Grant Program projects, or Flood Mitigation Assistance projects. Interested tribes can determine this by talking with their State Hazard Mitigation Officer or their respective FEMA Regional Federal Insurance and Mitigation Administration (FIMA) Division. In any case, each tribe should review their own plans before submitting them to their state or FEMA Regional office.

Following are explanations of each column.

- Column 1 indicates on what page or pages in the *State and Local Plan Interim Criteria* document more detailed information can be found regarding the requirements.
- Column 2 references and directly quotes the *44 CFR Parts 201 and 206 Interim Final Rule*.
- Column 3 is for the tribe and/or local jurisdiction to indicate the Section or Annex and the page number(s) in their plan where the requirement is addressed.
- Column 4 provides space for State/FEMA comments and for scoring of the plan.

Local Mitigation Plan Review and Approval Status

Local Requirement		
Local Plan Submitted to the State by: Fred Gifford MAXIM Technologies, Inc. Richard Seiler	Title: Senior Consultant Valley County DES Coordinator	Date: September 2003 November 17, 2003

State Requirement		
State Reviewer: Rich Petaja	Title: Montana Hazard Mitigation Grant Office	Date: November 17, 2003

FEMA Requirement		
FEMA Reviewer: Wade Nofziger Gail Shands Sara Brush	Title: Hazard Mitigation Specialist Hazard Mitigation Specialist G.I.S. Specialist	Date: December 19, 2003
Date Received in FEMA Region VIII	December 1, 2003	
Plan Not Approved		
Plan Approved	XXX	
Date Approved	December 19, 2003	

Point of Contact: Richard D. Seiler	Local Plan Reviewed by: Richard D. Seiler	
Title: Valley County DES Coordinator	Title: Valley County DES Coordinator	
Agency: Valley County Emergency Management	NFIP Status (Single Jurisdiction)	
Phone Number: 406/228-4333	Participating <input type="checkbox"/>	Non-Participating <input type="checkbox"/>

Multi-jurisdiction: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO (If yes, list each jurisdiction below:)	N/A*	NFIP Status (for mapped communities)	
1. Valley County, 1/1/87 Good Standing	<input type="checkbox"/>	Participating <input checked="" type="checkbox"/>	Non-Participating <input type="checkbox"/>
2. Town of Glasgow, NSFHA	<input type="checkbox"/>	Participating <input checked="" type="checkbox"/>	Non-Participating <input type="checkbox"/>
3. Town of Fort Peck	<input checked="" type="checkbox"/>	Participating <input type="checkbox"/>	Non-Participating <input type="checkbox"/>
4. Town of Nashua, 4/15/86 Good Standing	<input type="checkbox"/>	Participating <input checked="" type="checkbox"/>	Non-Participating <input type="checkbox"/>
5. Town of Opheim	<input checked="" type="checkbox"/>	Participating <input type="checkbox"/>	Non-Participating <input type="checkbox"/>

LOCAL HAZARD MITIGATION PLAN REVIEW – VALLEY COUNTY, MONTANA
REGION VIII, DECEMBER 19, 2003 – PAGE 3

**LOCAL MITIGATION PLAN SUMMARY
WORKSHEET**

The plan cannot be reviewed if the prerequisite is not met for a single jurisdictional plan, or prerequisites are not met for a multi-jurisdictional plan.

All mandatory criteria, except those highlighted in gray, must receive a score of “**Satisfactory**” or “**Outstanding**” for the plan to receive FEMA approval. A less than “Satisfactory” score on subsections highlighted in gray will not preclude the plan from passing. Reviewer’s comments must be provided for requirements receiving a “**Needs Improvement**” score.

SCORING SYSTEM

Please check one of the following for each requirement.

U – Unsatisfactory: The plan does not address the criteria.

N – Needs Improvement: The plan addresses the criteria, but needs significant improvement.
Reviewer’s comments must be provided.

S – Satisfactory: The plan meets the minimum criteria. Reviewer’s comments are encouraged, but not required.

O – Outstanding: The plan exceeds the minimum criteria. Reviewer’s comments are encouraged, but not required.

Prerequisite (s) (Check Applicable Box)

Adoption by the Local Governing Body:
§201.6(c)(5) **OR**
Multi-jurisdictional Plan Adoption: §201.6(c)(5)
AND
Multi-jurisdictional Participation: §201.6(a)(3)

NOT MET	MET
	X
	X
	X

Planning Process

Documentation of the Planning Process:
§201.6(c)(1)

U	N	S	O
		X	

Risk Assessment

Identifying Hazards: §201.6(c)(2)(i)
Profiling Hazard Events: §201.6(c)(2)(i)
Assessing Vulnerability: Overview: §201.6(c)(2)(ii)
Assessing Vulnerability: Identifying Assets:
§201.6(c)(2)(ii)(A)
Assessing Vulnerability: Estimating Potential
Losses: §201.6(c)(2)(ii)(B)

U	N	S	O
		X	
		X	
		X	
		X	
		X	

Assessing Vulnerability: Analyzing Development
Trends: §201.6(c)(2)(ii)(C)

Multi-jurisdictional Risk Assessment:
§201.6(c)(2)(iii)

		X	
		X	

Mitigation Strategy

Local Hazard Mitigation Goals: §201.6(c)(3)(i)
Identification and Analysis of Mitigation Measures:
§201.6(c)(3)(ii)
Implementation of Mitigation Measures:
§201.6(c)(3)(iii)
Multi-jurisdictional Mitigation Strategy:
§201.6(c)(3)(iv)

U	N	S	O
		X	
		X	
		X	
		X	

Plan Maintenance Procedures

Monitoring, Evaluating, and Updating the Plan:
§201.6(c)(4)(i)
Implementation Through Existing Programs:
§201.6(c)(4)(ii)
Continued Public Involvement: §201.6(c)(4)(iii)

U	N	S	O
		X	
		X	
		X	

Additional State Requirements*

Insert State Requirement
Insert State Requirement
Insert State Requirement

U	N	S	O

LOCAL MITIGATION PLAN APPROVAL STATUS

PLAN NOT APPROVED

PLAN APPROVED

XXX

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PLAN REVIEW CRITERIA REFERENCE (SECTION PAGE #)	REQUIREMENT AS TAKEN FROM THE INTERIM FINAL RULE PART 201	LOCATION IN THE PLAN (INDICATE SECTION OR ANNEX AND PAGE #)	SCORE / STATE / FEMA REVIEWER COMMENTS <u>SCORING SYSTEM</u> MET/NOT MET (FOR PREREQUISITE (S) ONLY) U--UNSATISFACTORY N--NEEDS IMPROVEMENT	S--SATISFACTORY O--OUTSTANDING
PREREQUISITE (S) (3-1)			<i>NOTE: The prerequisite, or prerequisites in the case of multi-jurisdictional plans, must be met before the plan can be approved.</i>	
Adoption by the Local Governing Body (3-2)	Requirement §201.6(c)(5): [The local hazard mitigation plan shall include] documentation that the plan has been formally adopted by the governing body of the jurisdiction requesting approval of the plan (e.g., City Council, County Commissioner, Tribal Council)...	Appendix A	S	Resolutions are provided.
OR				
Multi-Jurisdictional Plan Adoption (3-3)	Requirement §201.6(c)(5): For multi-jurisdictional plans, each jurisdiction requesting approval of the plan must document that it has been formally adopted.	Appendix A	S	The plan was adopted by all of the communities in the county.
AND				
Multi-Jurisdictional Planning Participation (3-4)	Requirement §201.6(a)(3): Multi-jurisdictional plans ...as each jurisdiction has participated in the process... Statewide plans will not be accepted as multi-jurisdictional plans.	Section 2.0 Appendix B	S	Meeting lists document participants from each jurisdiction. The city resolutions indicate they worked closely with the County in developing the plan.

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PLANNING PROCESS (3-5)				
Documentation of the Planning Process (3-6)	Requirement §201.6(c)(1): [The plan must document] the planning process used to develop the plan, including how it was prepared, who was involved in the process, and how the public was involved.	Section 2.0 Pages 8-9	S	They have done a great job of including stakeholders in the planning process, and they acknowledge the participants on Page 1. MAXIM Technologies completed much of the plan preparation and process, but many local, State, and Federal agencies were included in the process.
RISK ASSESSMENT (3-9)				
Identifying Hazards (3-10)	Requirement §201.6(c)(2)(i): [The risk assessment shall include a] description of the type....of all natural hazards that can affect the jurisdiction...	Sections 3.1, 3.2	S	Good description of the various hazards. Carefully thought-out and well documented.
Profiling Hazard Events (3-14)	Requirement §201.6(c)(2)(i): Location and extent of all natural hazards that can affect the jurisdiction. The plan shall include information on previous occurrences of hazard events and on the probability of future hazard events.	Sections 3.1, 3.2, and 3.4 Pages 10-31	S	Good review of past hazards and their impacts on the area. A historical summary is provided for each hazard, including the use of original newspaper articles to emphasize the impacts of the data. The history includes a summary of damages. Including participation by National Weather Service on the planning team resulted in an outstanding history of previous events, including wildfire.

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Assessing Vulnerability: Overview (Currently found under Identifying Assets section, p.3-18—to be corrected in next version of the <i>Plan Criteria</i>)	Requirement 201.6(c)(2)(ii): [The risk assessment shall include a] description of the jurisdiction's vulnerability to the hazards described in paragraph (c)(2)(i) of this section. This description shall include an overall summary of each hazard and its impact on the community.	Section 3 Pages 10-32	S Each hazard summary contains information on the impact to the community. The tables presented illustrate the vulnerability of each community to all high priority hazards identified above.
Assessing Vulnerability: Identifying Assets (3-18)	Requirement 201.6(c)(2)(ii)(A): The plan should describe vulnerability in terms of: The types and numbers of existing and future buildings, infrastructure, and critical facilities located in the identified hazard areas...	Section 3.3 Appendix C	S HAZUS inventories are used to estimate critical facility and general building stock exposure at the census block level to the identified hazards. The methodology is clearly explained and a summary of potential future projects is provided. A declining population is also noted and discussed. <i>Note: A less than "Satisfactory" score on this requirement will not preclude the plan from passing</i>

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Assessing Vulnerability: Estimating Potential Losses (3-22)	Requirement 201.6(c)(2)(ii)(B): [The plan should describe vulnerability in terms of an] estimate of the potential dollar losses to vulnerable structures identified in paragraph (c)(2)(i)(A) of this section and a description of the methodology used to prepare the estimate...	Section 3.5	S Good summary data. The vulnerability tables present potential losses by estimating exposure and risk to buildings, as well as societal risk. The methods used are clearly explained, and HAZUS '99 inventories are utilized. <i>Note: A less than "Satisfactory" score on this requirement will not preclude the plan from passing.</i>
Assessing Vulnerability: Analyzing Development Trends (3-24)	Requirement 201.6(c)(2)(ii)(C): [The plan should describe vulnerability in terms of] providing a general description of land uses and development trends within the community so that mitigation options can be considered in future land use decisions.	Section 3.3.3	S It is indicated that the overall County population is decreasing and that no growth is occurring in the identified hazard areas. They describe a proposed project that is not in an identified hazard area. In the future, projects should be linked to specific hazard reduction. <i>Note: A less than "Satisfactory" score on this requirement will not preclude the plan from passing.</i>
Multi-Jurisdictional Risk Assessment (3-26)	Requirement §201.6(c)(2)(iii): For multi-jurisdictional plans, the risk assessment section must assess each jurisdiction's risks where they vary from the risks facing the entire planning area.	Tables 3-9 Thru 3-11	S They have done a good job of assessing critical facilities at risk for each jurisdiction.

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MITIGATION STRATEGY (3-29)			<i>Note: Any changes made in the risk assessment to address previous unsatisfactory or needs improvement scores, will need to be reflected in the Mitigation Strategy section to gain final approval of the plan.</i>
Local Hazard Mitigation Goals (3-30)	Requirement §201.6(c)(3)(i): [The hazard mitigation strategy shall include: a] description of mitigation goals to reduce or avoid long-term vulnerabilities to the identified hazards.	Section 4.1	S Good layout of goals and strategies, especially when worked with the County's Comprehensive Growth Plan.
Identification and Analysis of Mitigation Measures (3-34)	Requirement §201.6(c)(3)(ii): [The mitigation strategy shall include a] section that identifies and analyzes a comprehensive range of specific mitigation actions and projects being considered to reduce the effects of each hazard, with particular emphasis on new and existing buildings and infrastructure.	Sections 4.1, 4.2, 4.3, and Appendix D	S Describes how projects were prioritized and how cost-benefit was emphasized. A broad range of potential mitigation strategies and actions are considered. The scope of these strategies includes response related improvements. The communities have done a great job in considering actions under all potential mitigation categories, and this reflects the excellent participation of the planning team and stakeholders.
Implementation of Mitigation Measures (3-36)	Requirement §201.6(c)(3)(iii): Action plan describing... prioritized, implemented, and administered by the local jurisdiction...cost-benefit review of the proposed projects and their associated costs.	Sections 4.3 and 4.4	S Section 4.3 describes how projects were prioritized and how cost-benefit was emphasized. The benefits include the impacts on people and property. In addition to the scoring matrix, the County DES coordinator and the LEPC applied "high", "med." and "low" rankings. Project implementation is described and the LEPC and DES coordinator play significant roles.

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Multi-jurisdictional Mitigation Strategy (3-40)	Requirement §201.6(c)(3)(iv): For multi-jurisdictional plans, there must be identifiable action items specific to the jurisdiction requesting FEMA approval or credit of the plan.	Table 4.2	S Well done. All jurisdictions seeking plan approval have identifiable items in the mitigation strategy and have clearly demonstrated their willingness to pursue action in the mitigation strategy.
PLAN MAINTENANCE PROCEDURES (3-43)			
Monitoring, Evaluating, and Updating the Plan (3-44)	Requirement §201.6(c)(4)(i): Method and schedule of monitoring, evaluating, and updating the mitigation plan within a five-year cycle.	Section 5.1	S Indicates a plan review will take place every two years, or as needed when new information is available.
Implementation Through Existing Programs (3-48)	Requirement §201.6(c)(4)(ii): Incorporate the plan into other mechanisms such as improvement plans...	Section 5.2	S Implementation through existing programs is described. Indicates mitigation goals will be adopted into the County's Comprehensive Growth Policy.
Continued Public Involvement (3-50)	Requirement §201.6(c)(4)(iii): Discussion on how the community will continue public participation in the plan maintenance process.	Section 5.3	S Continued public involvement is described including public meetings in conjunction with the plan review every two years. County advertising resources including newspaper and radio are described.